



# STATE OF IOWA

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DEPARTMENT OF EDUCATION  
JUDY A. JEFFREY, DIRECTOR

August 4, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Re: Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6  
Comments to Proposed Eligible Services List, Public Notice Released July 21, 2006  
(FCC 06-109); Suggestions for the 2007 Eligible Services List related to Video  
Scheduling Service

Dear Secretary Dortch:

The Iowa Department of Education wishes to comment on the proposed 2007 Eligible Services List. Our Department respectfully requests that the FCC require that USAC review and revise the Eligible Services List (ESL) related to eligibility of scheduling service for distance learning capability, video service, or interactive television. Our suggested justification and proposed changes are listed below.

## **Video scheduling/distance learning scheduling eligibility**

Schools and libraries in Iowa have invested heavily in videoconferencing classroom facilities in order to offer distance learning to Iowa students. To date, there are 422 video classrooms in K-12 buildings and 50 video classrooms in public libraries. Given the extent of the video classrooms in the state and the many hours of distance learning scheduled every year, scheduling of the connections among these 472 E-rate eligible locations is a challenge. We contend that scheduling services are clearly telecommunications services that should be E-rate eligible.

In the draft eligible services list glossary (page 32), "distance learning" is defined as follows: "Distance learning utilizes video and audio technologies to allow students who are remotely located from other students or the lecturer to participate interactively with the class." Page 31 defines "conferencing services" as follows: "Conferencing service provide a means for multiple users to participate in group discussions via telephone circuits or video facilities." Of special note in the "conferencing" definition is the phrase, "...provide a means...to participate." Scheduling IS a means of providing conferencing service for distance learning. We contend that the designation of scheduling service as

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non-telecommunications service (page 6) is inaccurate and inconsistent with the definition of "conferencing service" (page 31).

### **Scheduling is an integral component of distance learning**

One of the integral components in any video network offering live, real-time courses to a large number of schools and libraries statewide is a **scheduling service**. This is especially true in a statewide video service such as is found in Iowa.

The "scheduling service" controls the linkage between the sending and receiving classrooms for every class session offered by the service. In each hourly session there is a potential of having numerous remotely located classrooms linked electronically for the purposes of learning and instructing anywhere in the state. This is a massive task and becomes integral to the very operation of the statewide video distance education service. This function is a standard and integral component in the video service and should be eligible for E-rate discounts in the very same way that "...features typically provided for adequate functionality and performance when provided as a standard component of a vendor's Internet access service" are eligible in the Internet Access section of the draft 2007 ESL (page 11). This "scheduling" function is not a separate, non-telecommunications "service" tangential to the functioning of the network. It is integral to the functionality and performance of the network.

It is our belief that the integral nature of scheduling service is not adequately understood and has, therefore, been incorrectly identified as ineligible. We request that the eligible service list include scheduling service.

Respectfully,

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